Part C 2A-1

**Western Technologies Inc.**
The Quality People
Since 1955

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September 11, 2008

United States Environmental Protection Agency
Region 9
RCRA Corrective Action Office
Waste Management Division
Mail Code WST-5
75 Hawthorne Street
San Francisco, California 94105

Attn: Carmen D. Santos

Re: Amendment to the PCB Remediation Notice — WT Job No. 2188JK154
Washington Park Corporate Center
Lot 3 of Washington Park Corporate Center
4400 Block of East Washington Street
Phoenix, Arizona

Western Technologies Inc. presents this letter describing clarifications and contingencies for further action in connection with the testing proposed in the July 22 amendment. The contents of this letter are attached to the Amendment and are incorporated herein. This letter discusses clarifications on the sequence of implementation for the work on this project based on our telephone conversation on September 9.

The amendment describes additional site characterization work at the "Trench Area" and at the four proposed detention basins, as well as the proposed method of capping within the Trench Area.

**Summary of Proposed Actions**

Based on our conversation, there is a need to implement the site characterization work prior to the installation of the proposed capping method given the contingent plan to implement additional excavation if PCB levels are detected above 10 PPM at the Trench Area, or above 1 PPM in the detention basin areas. We also discussed the placement of lateral and vertical borings to characterize the Trench Area.

Based on the lithologic conditions at the site, specifically at the Trench Area, drilling operations will need to be implemented from a level surface. Therefore, the placement of fill across Lot 3 (the Subject Lot), inclusive of the Trench Area, is necessary to return it to grade and facilitate the drilling. The results of the characterization will be used to determine whether a contingent action is necessary, or whether the cap provisions can be installed. In either case, the fill material

placed into the Trench Area will need to be removed, then returned as engineered fill as part of the proposed cap system.

As we discussed, the placement of a concrete base in the trench and the engineered placement of fill to grade are proposed as the capping system to comply with the regulatory requirement. The building's foundation pad at the grade surface is not considered to be a part of the capping system since it only partially overlays the Trench Area, previously referred to as the Identified Contaminated Area. The system will also include the vertical barrier wall within the Trench Area to provide a measure of protection from inadvertent excavation during the installation of the detention basin.

We also discussed a maintenance plan for the cap system. Given that the concrete layer is sub-grade, and the thickness of earthen engineered fill component will exceed 16 feet, we are not proposing active management procedures because the system will be below grade and isolated from the elements and not subject to disturbance. Therefore, the notice to the deed will contain language identifying this area with limitations on depth of disturbance. We reiterate that the proposed deed language will be submitted to you for approval prior to filing in the public record.

**Sequence and Description of the Work**

Step 1, Placement of Fill on Lot 3 – The owner shall arrange to import fill to Lot 3 to bring its surface back to original grade. Material will temporarily be placed into the Trench Area to facilitate the staging and positioning of drill rigs and equipment. Once filled, the Trench Area and proposed detention basins will be located by surveying them. We are requesting to implement this fill activity immediately to advance the project schedule.

Step 2, Implement the Site Characterization Work – We will advance three borings within the limits of the Trench Area and six borings around the perimeter of the Trench Area to characterize the vertical and lateral extent of PCBs. The borings will be drilled with a down-hole percussion hammer drilling technique (ODEX) system. This technique is ideal for difficult subsurface conditions such as large cobbles, boulders, and bedrock where traditional mud rotary or stem auger is not feasible. Drilling is usually carried out using air to actuate the down-hole hammer and to carry the soil and rock chips to the surface. The ODEX drilling system will be used to advance the soil borings at the Trench Area and the detention basins as proposed in the Amendment.

In summary, we have proposed to advance three soil borings to 40 feet below grade in the identified contaminated area to address PCB concentrations below this area. We have also proposed to advance borings in the planned locations of storm water detention basins to depths of 20 feet below grade.

Step 3, Implement Contingent Actions – The following contingent actions are proposed to respond to characterization data that shows the presence of PCBs exceeding 10 PPM at the Trench Area, or 1 PPM at the proposed detention basins.

- PCBs above 1 PPM at the Detention Basins – The detection of PCBs above the 1 PPM standard within the proposed detention basin areas will result in further excavation to remove these materials according to the approved remediation notice. The planned depth of removal will be prescribed based on the vertical profile of results. The overburden fill soil placed in Step 1 will be removed and stockpile on site for re-use since it is unregulated. The depth of overburden removal will be controlled to prevent the inadvertent removal of potentially regulated material beneath it. The excavated material will be managed as solid waste or as TSCA-regulated waste depending on whether concentrations are below or at-or-above 50 PPM, respectively. Once excavation is completed, verification samples will be taken using the prescribed 1.5-meter composite sampling grid. If removal work reaches the 18-20 foot depth and PCB concentrations remain above 1 PPM, then a concrete cap as prescribed in the amendment and meeting the minimum thickness and permeability requirements will be installed, along with the required notification to the deed.

- PCBs above 10 PPM at the Trench Area (also referred to as the Identified Contaminated Area) - The detection of PCBs above 10 PPM beneath the identified contaminated area will require further excavation and removal of PCB-impacted soil. The overburden fill soil placed in Step 1 will be removed and stockpiled on site for re-use since it is unregulated. The planned depth of removal will be prescribed based on the vertical and lateral profile of results and shall be established at a sufficient depth to encompass PCB concentrations exceeding 10 PPM. The excavated material will be managed as solid waste or as TSCA-regulated waste depending on whether concentrations are below or at-or-above 50 PPM, respectively. Once excavation is completed, verification samples will be taken using the prescribed 1.5-meter composite sampling grid. If the final verification results indicate that residual PCB concentrations are at or below 1 PPM, then we will eliminate the capping provisions. If they remain above 1 PPM, the capping provisions shall be re-installed.

- PCBs above 10 PPM at the Trench Area (also referred to as the Identified Contaminated Area) and Excavation is Not Feasible – To address the detection of PCBs above 10 PPM beneath the identified contaminated area at unfeasible depths of further excavation, a site-specific risk-based closure determination using risk-based clean-up provisions at §761.61(c) will be considered. We understand from our conversations that such a closure provision will require the submittal of a new notification, inclusive of site characterization data and determinations of risk and will require an additional review process.

**Closure**

If you have any questions about this letter, feel free to contact David Regonini at Western Technologies Inc. at 602-437-3737. As we discussed, Western Technologies and the Owner are able to meet with you personally to review and discuss this project. Thank you again for your attention to this correspondence. We look forward to your review and commentary.

Respectfully,
**WESTERN TECHNOLOGIES INC.**

David Regonini, REA
Director, Environmental Services

Humberto F. Preciado, Ph.D., P.E.
Geotechnical Engineer

C: AIG Retirement Services, Inc.
In Care of DST Real Estate Advisors
Attention: Douglas Tymins As Authorized Agent for AIG Retirement Services Inc.
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